

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Implementation of the Child Safe Viewing Act;)	MB Docket No. 09-26
Examination of Parental Control Technologies)	
for Video or Audio Programming)	
)	

COMMENTS OF COMCAST CORPORATION

Comcast Corporation (“Comcast”) hereby responds to the above-captioned Notice of Inquiry (“*Notice*”).¹ Comcast recognizes that not all video programming is appropriate for every age group. That is why, as described in more detail below, Comcast *empowers* parents to determine what content is appropriate for their children by providing its customers with a wide-range of parental control options and *educates* parents about the tools that are available to them. Comcast’s parental controls demonstrate its commitment “to give consumers choice, give parents control, and educate both parents and kids so that they can become smarter, better viewers.”²

I. COMCAST GIVES CONSUMERS CHOICE.

Consumer tastes vary widely. Recognizing that, Comcast provides its customers over 1,000 programming and price combinations that let them choose the mix of services that meets their individual programming interests and household budgets. To the extent parents want to keep certain content they find objectionable from entering their homes, Comcast offers a number

¹ *In re Implementation of the Child Safe Viewing Act; Examination of Parental Control Technologies for Video or Audio Programming*, Notice of Inquiry, 24 FCC Rcd. 3342 (2009) (“*Notice*”).

² D. Cohen & J. Waz, *Controlling the Remote*, Blueprint, Vol. 4, at 50-52 (2005), available at http://www.ndol.org/ndol_ci.cfm?kaid=114&subid=144&contentid=253576.

of programming packages that the Commission and many families would consider to be acceptable for their families. For example, Comcast's limited basic service includes all local broadcast stations and public, educational, and government channels.³ (Of course, even broadcast stations carry some programming that may not be considered appropriate for younger viewers, and is appropriately labeled.) For consumers who want a more diverse programming lineup, the technologies described below empower parents to create their own customized tier of programming by using the "favorites" feature to select the channels they want and using parental controls to block the channels and programs they do not want.

Comcast, being the largest residential broadband provider in the United States, offers Comcast High Speed Internet ("HSI") customers access to an even wider array of video content online. To assist its customers in managing their families' experience online, Comcast offers the solutions described in more detail below.

II. COMCAST PROVIDES TOOLS TO GIVE PARENTS CONTROL OVER VIDEO CONTENT IN THEIR HOMES.

No matter how Comcast customers get their video, whether through Comcast's traditional cable service or over Comcast's HSI service, they have access to advanced parental controls that allow them to restrict their children's access to content they may find objectionable.

³ Comcast subscribers may also select a family tier that provides programming that is widely considered to be family-friendly. See Press Release, Comcast Corp., *Comcast Announces Family Tier* (Dec. 22, 2005), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.aspx?PRID=101>. The family tier provides approximately 35–40 channels, including up to 16 family tier-specific channels and others from Comcast's limited basic service. See Comcast Corp., *Comcast Kids, Family Tier Programming Package*, at <http://comcastkids.ecityinteractive.com/factTier.aspx> (last visited Apr. 16, 2009).

A. Comcast Provides Tools for Parents To Control Cable Television Content.

Comcast empowers parents to block programming they may find objectionable on both digital and analog cable. For any Comcast customer, Comcast will block any channel upon request and for no charge. For Comcast subscribers who use the V-chip, the most widely deployed parental control technology, which of course allows for blocking of individual programs based on their rating, Comcast's systems are compatible with and support that technology.

For analog subscribers, depending on their local Comcast system, Comcast may use a signal trap or a set-top box to block programming that parents deem objectionable.⁴ Digital cable subscribers with two-way digital set-top boxes, or consumer electronics devices containing tru2way technology, have more numerous and versatile parental control options.⁵ These options include the ability to block programming by channel, by program title, and by rating (including both TV rating and MPAA rating).⁶ The controls similarly allow parents to block or limit access to Video-on-Demand ("VOD") content and to programs recorded using Comcast's digital video

⁴ A signal trap is an electronic filter that "traps" out a particular channel. The signal trap is physically installed on the cable equipment outside a customer's home and provides complete blocking of the specific channel until the signal trap is removed.

⁵ Comcast is working to steadily increase the number of homes that subscribe to its digital cable service. At the end of 2008, digital subscribers constituted 70.3% of Comcast's customer base. That percentage is expected to be closer to 78% by 2010 if the growth trend of the past two years continues. See Comcast Corp., *Pro Forma Cable Customer Metrics* (Feb. 18, 2009), available at http://media.corporate-ir.net/media_files/irol/11/118591/Earnings_4Q08/4Q08Trending.pdf.

⁶ See Attachment 1 for an overview of Comcast's cable television parental controls. The parental control features described herein are available to the majority of Comcast subscribers. A smaller portion of Comcast systems have parental control features that are substantially similar to what is described, but are differentiated in some respects (for example, blocking by time period is only available in some areas). Comcast is working toward common parental controls for all of its cable television subscribers.

recorder (“DVR”) service. The controls also allow parents to hide the titles of shows from appearing in the electronic program guide (“EPG”).

Comcast believes that ratings information provides a valuable tool for parents to determine whether content is appropriate for their families. Thus, Comcast requires by contract that all linear programming networks that it carries provide programming ratings. Consistent with the cable industry’s commitment to improve the TV ratings system, channels managed by Comcast, including PBS KIDS Sprout, G4, E!, Style, Golf Channel, Versus, and the Comcast SportsNets, utilize larger and more frequent ratings icons.

B. Comcast Empowers Parents To Control Content That Their Children Can Access Online.

In addition to offering powerful tools for parents to limit their children’s access to cable television programming, Comcast also empowers parents to protect their children online.⁷ Comcast has partnered with McAfee to offer parental controls that not only permit parents to filter out content they deem inappropriate, including websites that offer video programming, but also monitor Internet activity to help parents protect their children against online predators, identity theft, and exposure to unwanted content. Comcast offers the McAfee software to its HSI customers at no additional charge. Among other things, the McAfee parental controls allow parents to: (1) establish time limits for when their children may use the Internet, by day of the week and hour of the day; (2) block access to websites that parents may find objectionable, including preventing children from accidentally accessing sites containing material deemed

⁷ Press Release, Comcast Corp., *Comcast Launches Comprehensive Internet Security Solution To Help Keep Customers Safe Online* (Aug. 16, 2005), available at <http://www.comcast.com/about/pressrelease/pressreleasedetail.ashx?prid=132>.

objectionable by the parent; (3) limit access to content parents may find objectionable using image analysis, even on websites that may not be blocked; (4) restrict access to content parents may find objectionable using keyword filters; and (5) prevent online posting or release of information that parents designate as “private,” such as phone numbers and home addresses.⁸ In addition to the McAfee software, Comcast provides Comcast SafeSearch, a kid-safe Internet search tool, powered by Google.⁹ Comcast also offers an e-mail feature that enables parents to limit who their children may receive e-mail from (e.g., parents can create a specific list of individuals who are allowed to send e-mail to their children, thus blocking e-mail from spammers advertising material parents may find objectionable).

III. COMCAST INFORMS PARENTS ABOUT THE TOOLS AVAILABLE TO THEM AND PROMOTES RESOURCES ABOUT MEDIA LITERACY AND PROVIDING A SAFE MEDIA ENVIRONMENT IN THE HOME.

Comcast strives to inform its subscribers about the parental control options available to them. In the words of Comcast’s Chairman and CEO Brian Roberts: “We want every parent in America to know about parental controls.”¹⁰ Comcast provides information about its cable television parental controls in a variety of formats:

- Every new Comcast customer receives parental controls instructions in their Customer Welcome Kit.

⁸ See Comcast Corp., *Comcast.net Security*, at <http://www.comcast.net/Security/SecSuiteSSO/> (last visited Apr. 16, 2009).

⁹ See Comcast Corp., *FAQs, What Is Safe Search?*, at <http://www.comcast.com/customers/faq/FaqDetails.ashx?ID=2937&fss=safesearch> (last visited Apr. 16, 2009).

¹⁰ Jube Shiver Jr., *Cable Industry To Publicize Controls*, LA Times, Apr. 28, 2005, available at <http://articles.latimes.com/2005/apr/28/business/fi-cable28>; see also Ted Hearn, *Roberts Leads ‘Control’ Charge*, Multichannel News, May 1, 2005 (noting that “Roberts took center stage here last Wednesday to announce cable’s latest educational and technology-blocking solutions for parents”), available at http://www.multichannel.com/article/82371-Roberts_Leads_Control_Charge.php.

- On an annual basis, Comcast provides a prominent statement on bills to let customers know about parental control tools, directing them where to find more information.
- Comcast staffs a dedicated telephone hotline at 1-866-781-1888 between 9:00 a.m. and 11:00 p.m. (ET) to assist parents with parental control tools. The hotline number is promoted in Customer Welcome Kits as well as online.¹¹
- Comcast customers can learn about the parental control tools available to them online at <http://www.comcast.com/Corporate/Customers/ParentalControls.html/>.¹²
- A parental controls instructional video is available on Comcast's VOD service and on Comcast cable systems' instructional channels.
- In 2008 alone, Comcast aired more than 5.8 million public service announcement ("PSA") spots, valued at more than \$60 million, to help educate parents about parental controls.¹³

As an additional tool for parents, Comcast and Common Sense Media entered into a multi-year commitment to make detailed, age-based information about television shows, movies, websites, video games, and books available to Comcast subscribers. Pursuant to that

¹¹ See Comcast Corp. *Parental Controls*, at <http://www.comcast.com/Corporate/Customers/ParentalControls.html/> (last visited Apr. 16, 2009).

¹² See *id.*

¹³ The cable industry, including Comcast, has made significant commitments in recent years to run PSAs to help educate parents about parental controls. See, e.g., Press Release, Nat'l Cable & Telecomm. Ass'n ("NCTA"), *U.S. Cable Industry Launches "Take Control. It's Easy" Campaign to Help Parents Manage Their Family's TV Viewing* (Apr. 27, 2005) ("To alert cable customers to the parental control features available to them, the cable industry has pledged to feature PSAs in air time valued at \$250 million over the next 12 months, in markets nationwide and during all TV viewing periods."), available at <http://www.ncta.com/ReleaseType/MediaRelease/369.aspx>. Beginning in August of 2006, the industry committed to running the Ad Council's "TV Boss" parental control PSAs. See Press Release, NCTA, *Media and Entertainment Industries Unite in Unprecedented Effort to Help Parents Monitor Kids' TV* (July 25, 2006) ("The new PSAs are being distributed to media outlets nationwide this month and will appear in advertising time and space donated by the media. The media company campaign partners have committed to donate an unprecedented \$300 million in advertising time and space for the new PSAs during the next eighteen months."), available at <http://www.ncta.com/ReleaseType/MediaRelease/3482.aspx>. During 2008, Comcast led the cable industry in terms of the number of spots aired and their overall value.

commitment, Comcast makes dozens of Common Sense Media's reviews of movies and television programs available on its VOD service and on Comcast.net.¹⁴

Comcast provides a wealth of information to consumers about keeping children safe online at the Comcast.net Security Channel. The website, available at <http://www.comcast.net/security/>, includes information about the McAfee software, educational materials about staying protected from security threats, steps to take to report child endangerment, and links to important additional information about keeping families safe online.¹⁵

As noted in the recent report *Parental Controls and Online Child Protection: A Survey of Tools and Methods*, Comcast participates in multiple efforts to educate parents and to protect children.¹⁶ For example, Comcast has a partnership with iKeepSafe, a coalition of 49 state governors and first spouses, law enforcement officials, the American Medical Association, the American Academy of Pediatrics, and other corporations and private associations that provides

¹⁴ See Press Release, Comcast Corp., *Common Sense Media: Comcast and Common Sense Media Announce Partnership To Provide Cross-Platform Media Education Tools for Parents* (Feb. 5, 2007) (Common Sense Media, a "non-partisan organization dedicated to kids and media, provides independent, age-based reviews and ratings on movies, television shows, books, video games, websites and music so families can determine whether the selection is right for them."), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=13&fss=parents>. Common Sense Media's informational programs on media topics of concern to families, such as Internet Safety, are also available.

¹⁵ See Press Release, Comcast Corp., *Comcast Launches Comprehensive Internet Security Solution To Help Keep Customers Safe Online* (Aug. 16, 2005) available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=132&fss=security>.

¹⁶ See Adam Thierer, *Parental Controls and Online Child Protection: A Survey of Tools and Methods*, Version 3.1, Fall 2008, at 94, 96, 136 (noting that Comcast is, among other things, a supporter of GetNetWise.org (www.getnetwise.org), a public service website operated by the nonprofit Internet Education Foundation, and a coalition member of Project Online Safety (www.projectonlinesafety.com), an online portal offering a directory of online safety tools and educational materials developed by technology companies, media organizations and nonprofits), available at <http://www.pff.org/parentalcontrols/Parental%20Controls%20&%20Online%20Child%20Protection%20%5BVERS%20ION%203.1%5D.pdf>. See Attachment 2 for an overview of Comcast's online safety efforts.

tools and guidelines to teach children the safe and healthy use of technology.¹⁷ Comcast is also at the forefront in working with the inter-industry coalition, PointSmart.ClickSafe., to identify “best practices” among Internet service and online content providers.¹⁸ Most recently, Jay Opperman, Comcast’s Director of Online Security, was named to the National Telecommunications and Information Administration’s Online Safety and Technology Working Group.¹⁹

Comcast is also a member of the Family Online Safety Institute (“FOSI”), an international, non-profit membership organization dedicated to working to develop a safer Internet, and an executive of the company serves on FOSI’s board.²⁰ Comcast showcased its Internet Safety initiatives at FOSI’s Washington conferences in 2007 and 2008, was a leading sponsor of FOSI’s 2008 conference, and has participated in numerous FOSI events, including an event focused exclusively on wireless safety to be held on April 22, 2009.²¹ In December 2008,

¹⁷ See, e.g., Press Release, Commonwealth of Va., Office of the Attorney Gen., *Attorney General McDonnell, Comcast, iKeepSafe Unveil Internet Safety Video Available ‘On Demand’* (July 8, 2008) (reporting that Attorney General McDonnell, Comcast, and iKeepSafe unveiled a new video teaching children and parents about online safety that will be available via Comcast’s VOD service), available at http://www.oag.state.va.us/PRESS_RELEASES/NewsArchive/070808_iKeepSafe_Video.html; Press Release, Wash. State Office of the Attorney Gen., *iKeepSafe Honors Washington Attorney General McKenna with the Internet Keep Safe Award* (June 11, 2008) (announcing that iKeepSafe and Comcast are “bringing the ‘Faux Paw the Techno Cat®’ Internet safety program to a local elementary school and that students will participate in a special program with Attorney General McKenna, hosted by iKeepSafe and Comcast, to learn how to have a safe and healthy experience with connected technology”), available at <http://www.atg.wa.gov/pressrelease.aspx?id=19936>.

¹⁸ See *PointSmart.ClickSafe.*, at <http://www.pointsmartclicksafe.org/flash.html> (last visited Apr. 16, 2009).

¹⁹ See *Morris, Thierer Named To Web Safety Panel*, Nat’l J. Tech Daily Dose, Apr. 6, 2009, at <http://techdailydose.nationaljournal.com/2009/04/morris-thierer-named-to-web-sa.php#more> (last visited Apr. 16, 2009).

²⁰ See FOSI, *Membership Working To Develop a Safer Internet*, at <http://www.fosi.org/cms/index.php/abouttheinstitute.html> (last visited Apr. 16, 2009).

²¹ See FOSI, *Agenda - Keeping Kids Safe in a Mobile Environment*, at <http://www.fosi.org/cms/index.php/events/348-agenda-kidssafe.html> (last visited Apr. 16, 2009).

Mitch Bowling, Senior Vice President and General Manager of Comcast.net, received FOSI's Award for Outstanding Achievement for his commitment to advancing the goal of a safer Internet.²²

* * *

Comcast regularly surveys its subscribers to confirm that it is providing the parental control technologies they demand.²³ These surveys demonstrate that Comcast is offering the parental controls demanded by subscribers and that subscribers are very satisfied with the level of functionality provided. Nevertheless, Comcast is constantly exploring better and more innovative ways to empower parents to control their children's exposure to content they may find objectionable.²⁴

²² Press Release, Comcast Corp., *Comcast's Mitch Bowling Receives Award For Outstanding Achievement from the Family Online Safety Institute* (Dec. 11, 2008) ("Bowling was chosen to receive this award based on his tireless commitment to advancing the goal of a safer Internet," said Stephen Balkam, CEO of FOSI. "It's wonderful to see Comcast's online services being led by an individual who is truly passionate about educating consumers about how to keep safe on the Internet."), available at <http://www.comcast.com/About/PressRelease/PressReleaseDetail.ashx?PRID=830&fss=fosi>.

²³ Comcast routinely studies the level of customer satisfaction related to its parental controls. A recent Usage and Satisfaction study by Frank N. Magid Associates, Inc. demonstrates that Comcast subscribers who use the parental control tools are very satisfied with them. In fact, the study found that 75% of subscribers who use the parental controls gave them a rating of 7, 8, 9, or 10, on a 10-point scale.

²⁴ See, e.g., Attachment 1 at 17 (describing new parental control features that Comcast is currently exploring).

IV. CONCLUSION.

Although the parental control tools Comcast currently offers allow parents to control their children's exposure to content they may find objectionable almost as effectively as a parent pushing the "off" button, Comcast will continue its efforts to bring its customers the latest parental control technologies for their cable and Internet services.

Respectfully submitted,

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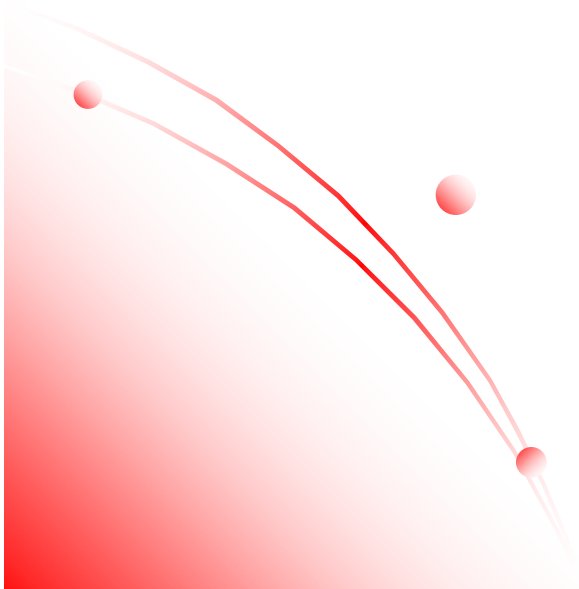
Attorneys for Comcast Corporation

April 16, 2009

ATTACHMENT 1



Comcast Parental Controls Overview



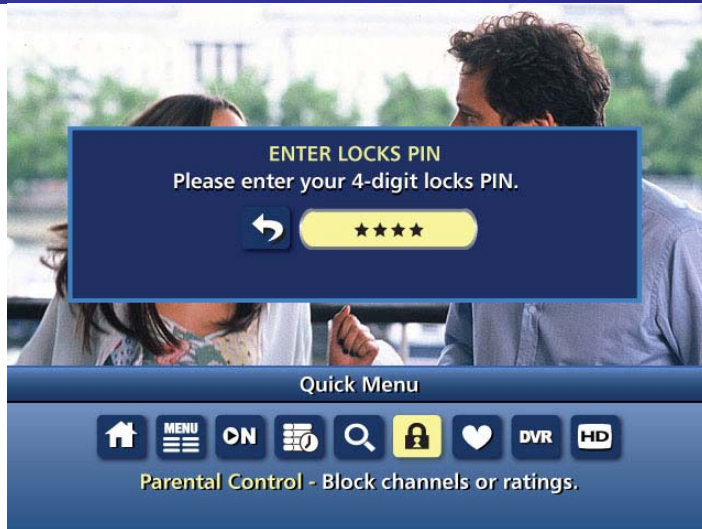
Parental Control Functionality in customer homes today...

1. PIN Setup for Parental Locks and Purchasing
2. Type of Locks supported
 - Lock by TV Rating
 - Lock by Movie Rating (MPAA)
 - Lock by Content Type (TV only)
 - Lock by Channel
 - Lock by Title of program
 - Service Locks (VOD)
3. Master Locks
4. Hide Adult Titles





Access Parental Controls from Quick Menu or Main Menu



Quick Menu



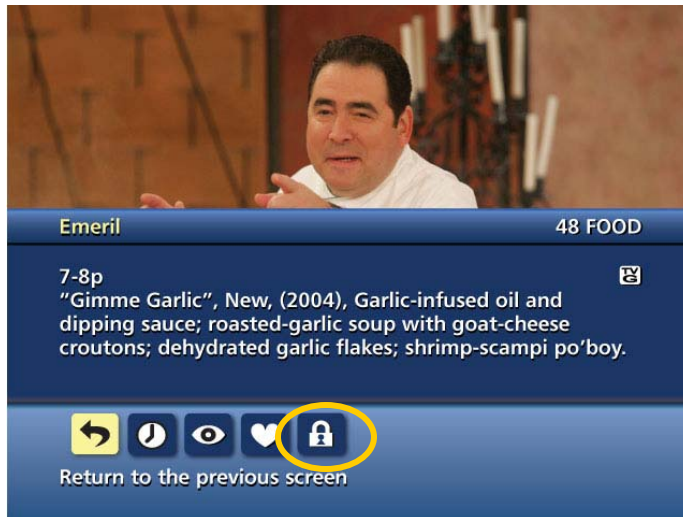
Main Menu



Parental Control Menu



Accessing Parental Controls from Program Info or Live TV



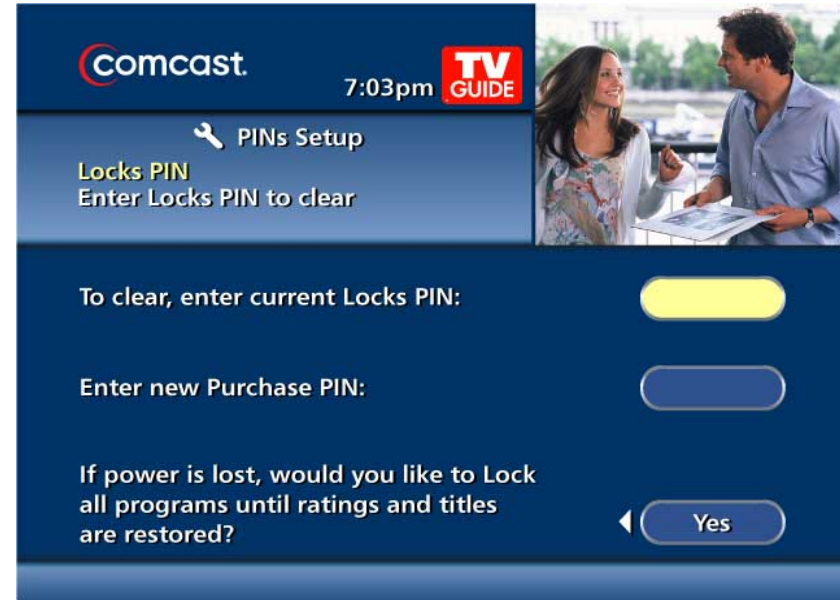
Program Info



Pressing "Lock" on remote while watching TV

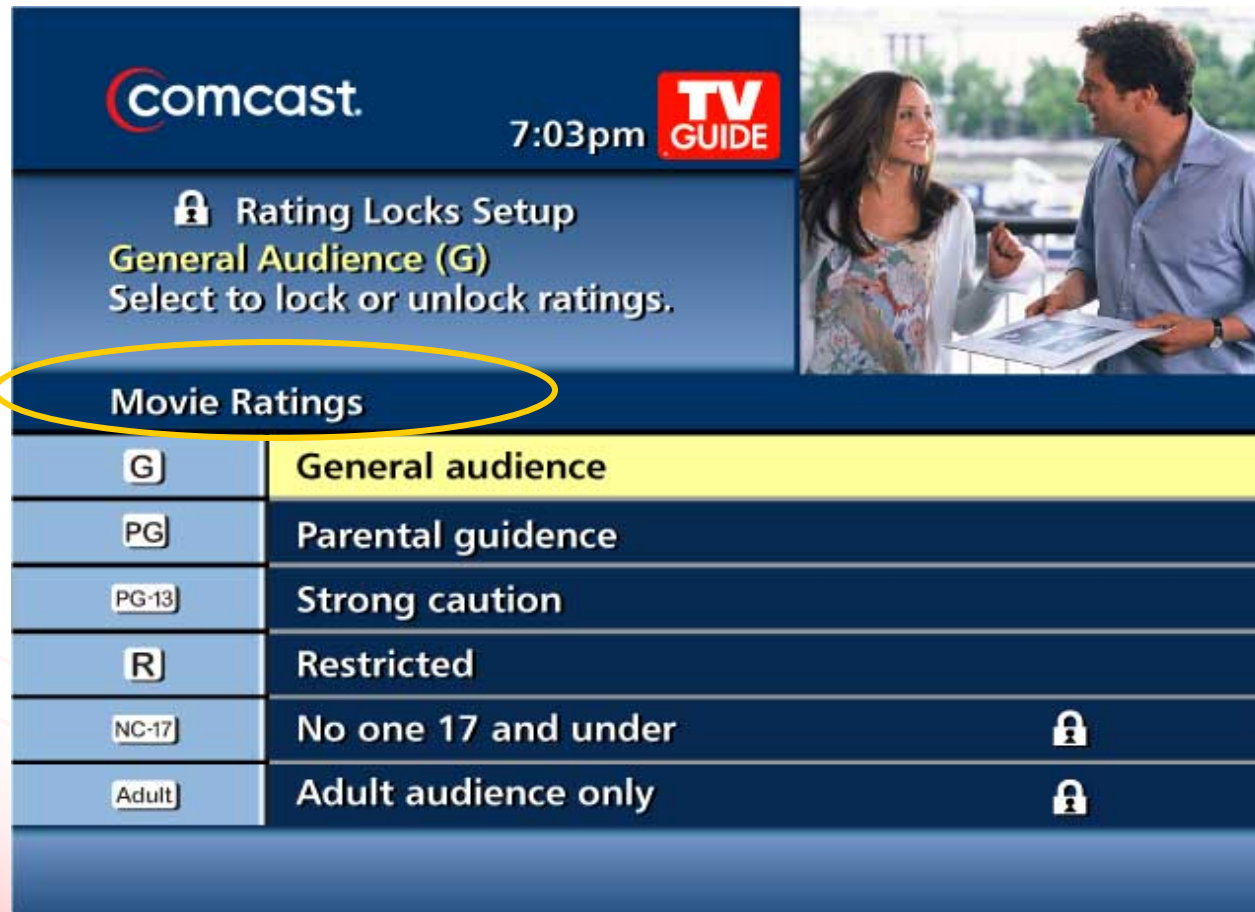


Lock Options Overlay



Setup Menu for Parental Locks Pin and Purchase Pin

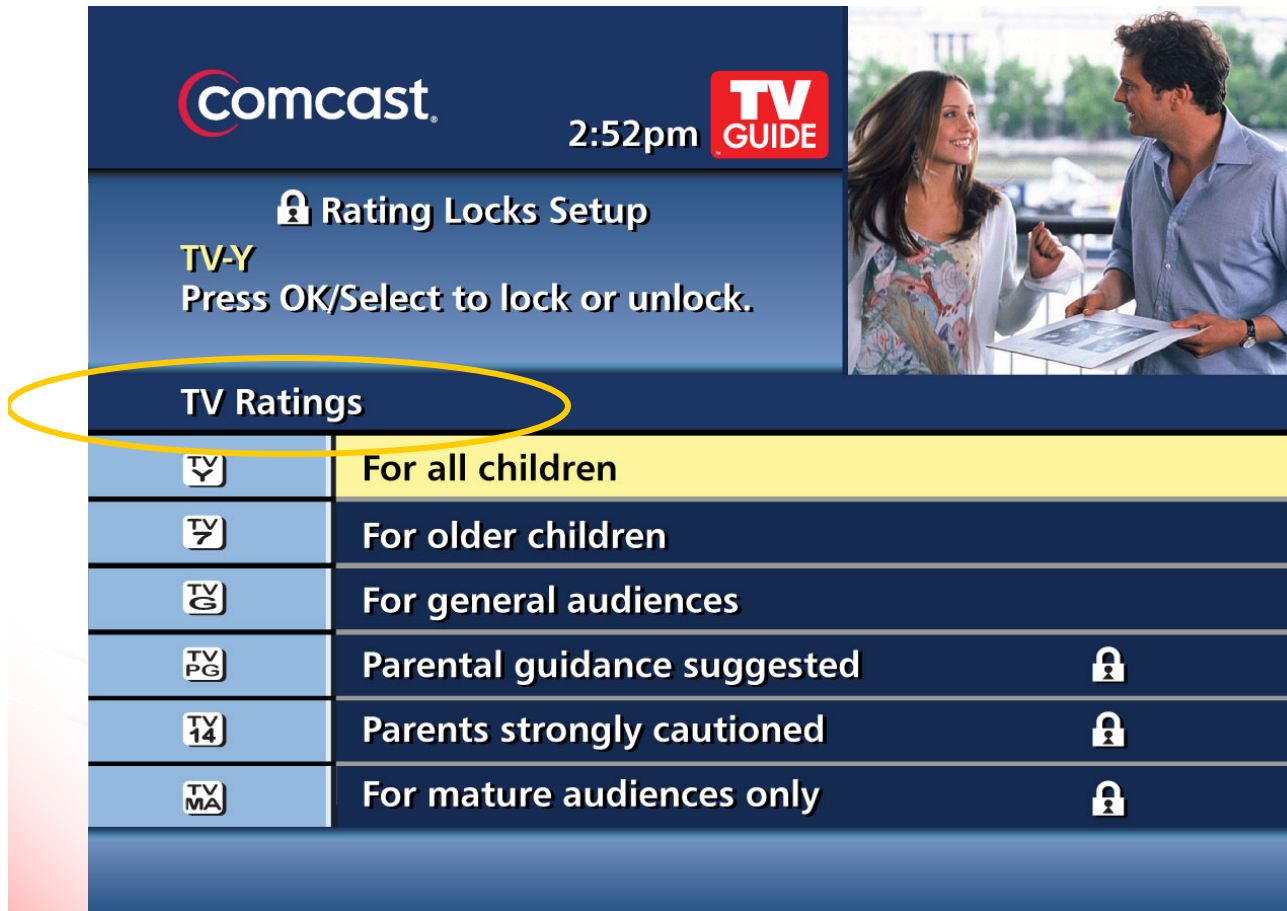
- **Clear PIN** – allows customers to easily change their PIN at anytime
- **New PIN** – customers can establish a new PIN for Locks or Purchasing
- **Power loss Lock** – if power is lost this will lock all content until guide data is restored



Improved Locks w/ listing style screens

1. User can see all movie ratings and lock status
2. “Ratings Ceiling” – automatically enforces ratings at the currently selected severity and any more severe content

Example: Customer has selected NC-17 to lock, the guide automatically locked Adult content



Improved Locks w/ listing style screens

1. User can see all movie ratings and lock status
2. “Ratings Ceiling”

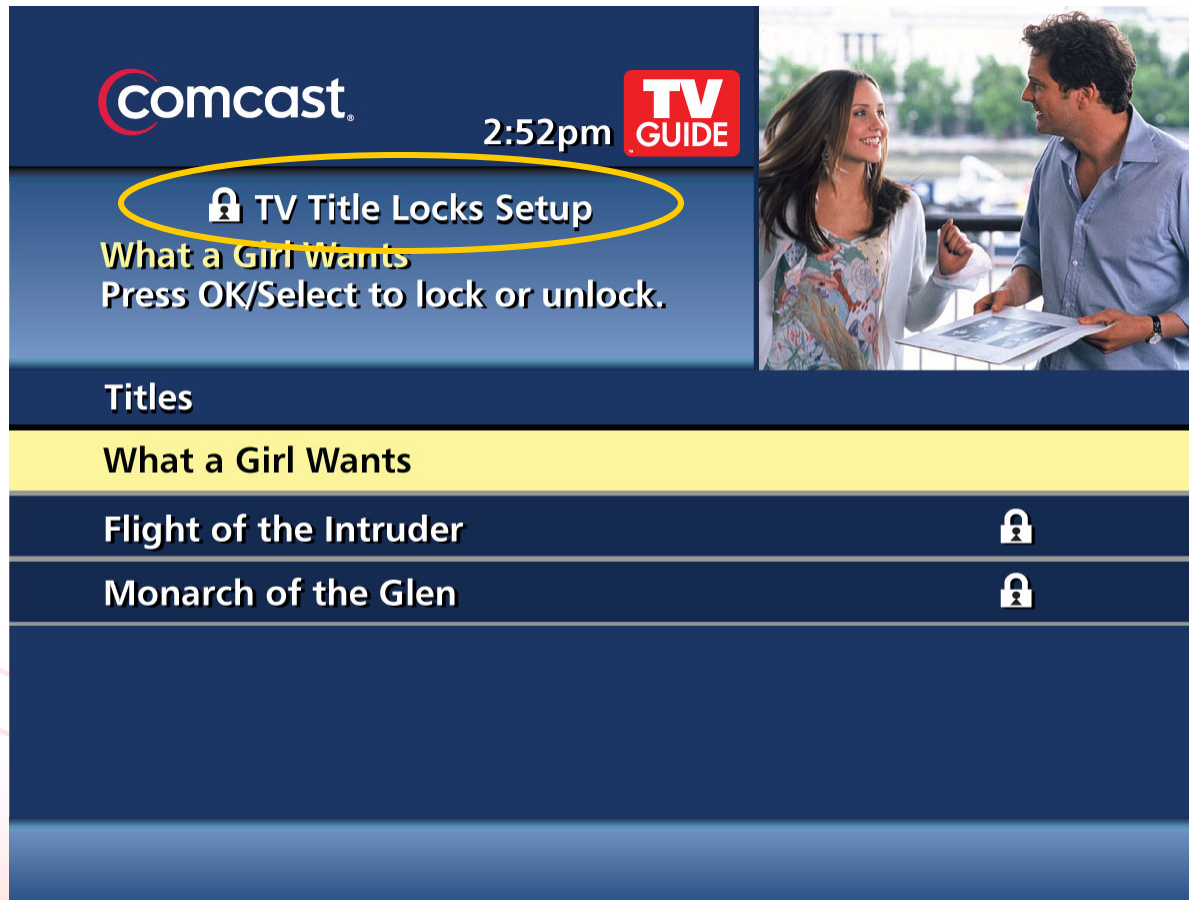
Example: Customer has selected TVPG to lock, the guide automatically locked both TV14 and TVMA content



Improved Locks w/ listing style screens

1. User can sort channels by number or channel name
2. User simply presses "OK" on the remote to lock or unlock a channel

Example: Customer has selected to lock USA, VH1 and Comedy Central



Improved Locks w/ listing style screens

1. User can see all titles that are locked
2. User simply presses "OK" on the remote to unlock a title or to re-lock
3. Anytime programs with these titles air, they will be locked regardless of their rating or channel

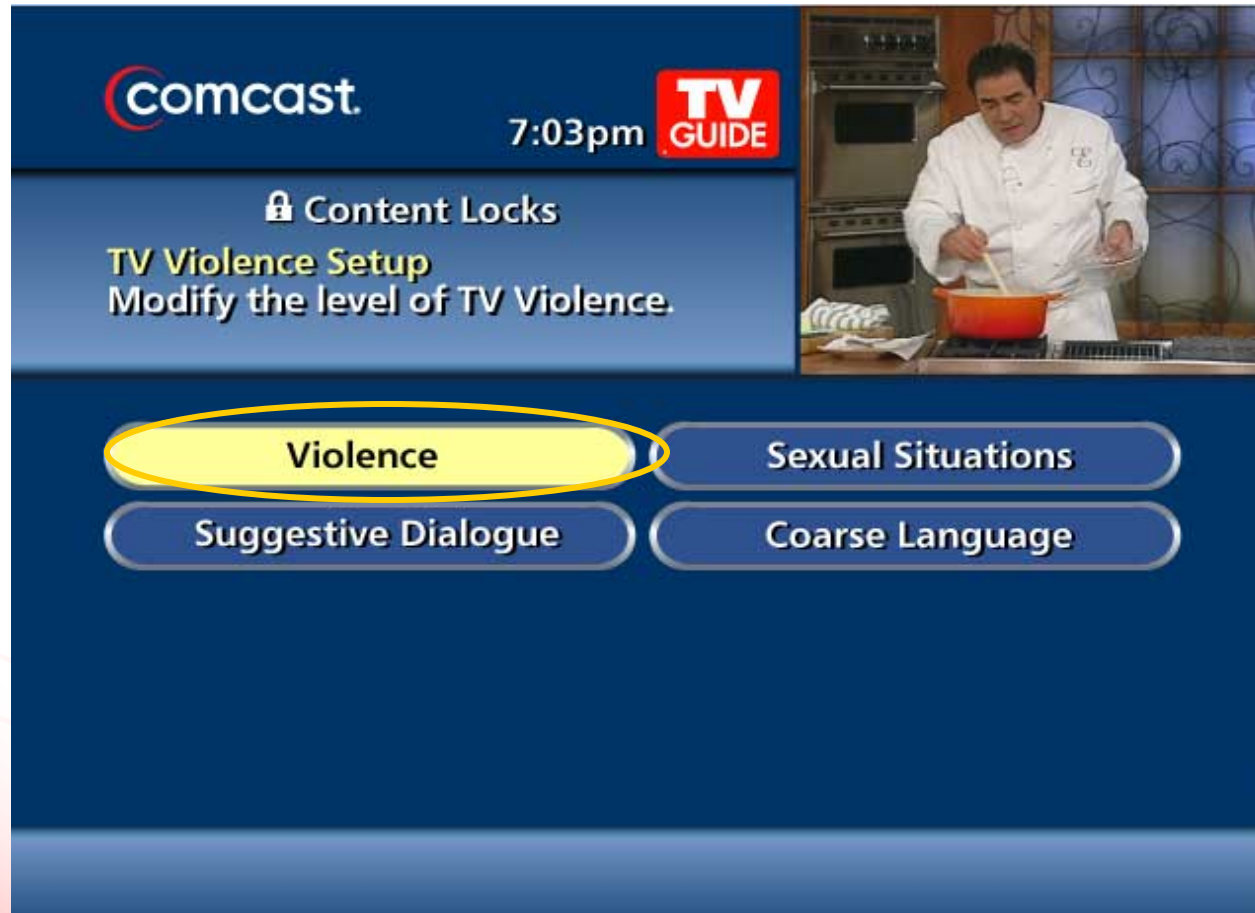
Example: Customer has selected to lock "Flight of the Intruder" and "Monarch of the Glen"



Content Locks

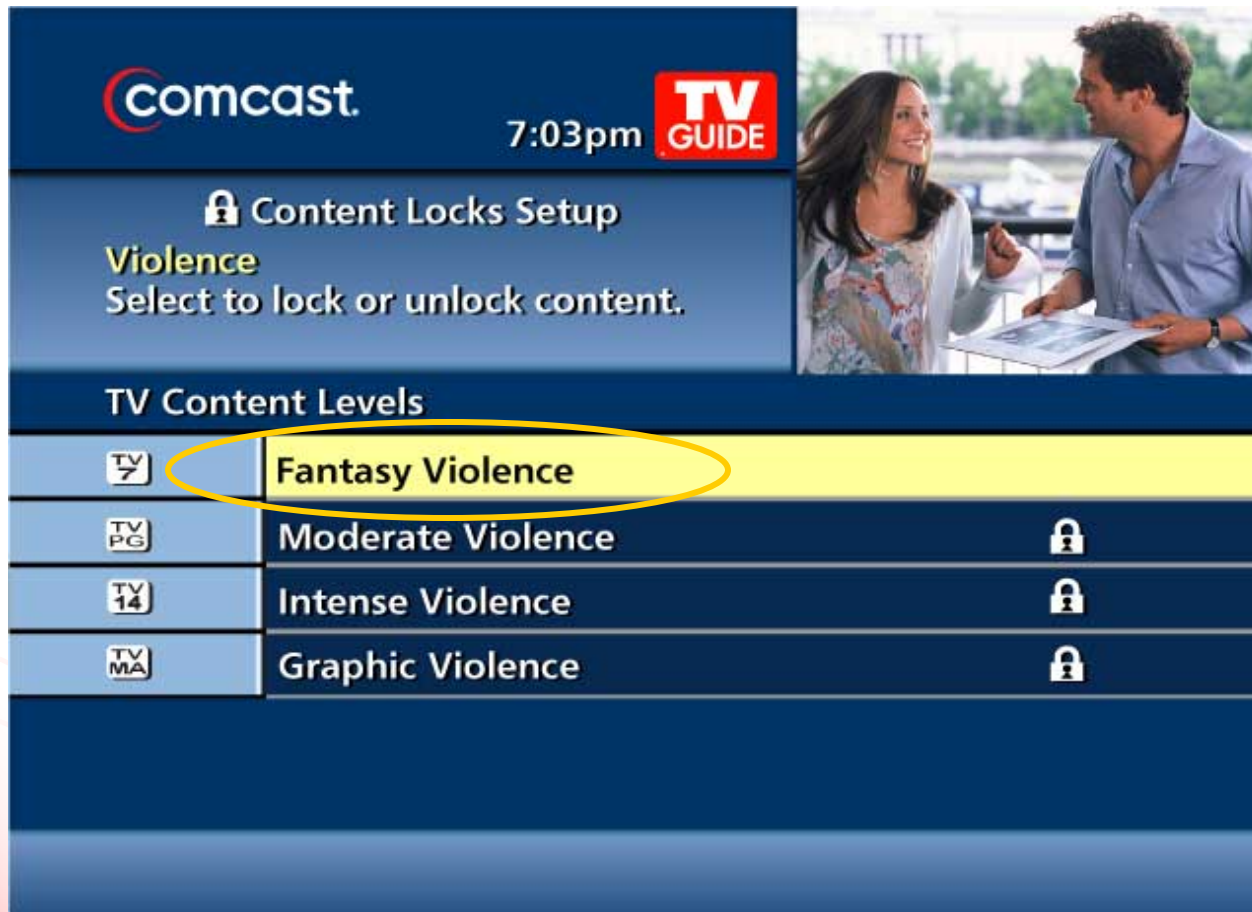
1. Content Locks can be used to block portions of unlocked TV Ratings.
2. Locking a rating automatically locks all content associated with that rating. There is no need to apply both content and rating locks. Content locks allow users to set more granular locks and just lock portions of ratings.

Example: A customer locks TVPG “sexual situations” but not TVPG “violence”



Content Locks

1. Users choose to lock specific TV content, Example "violence"

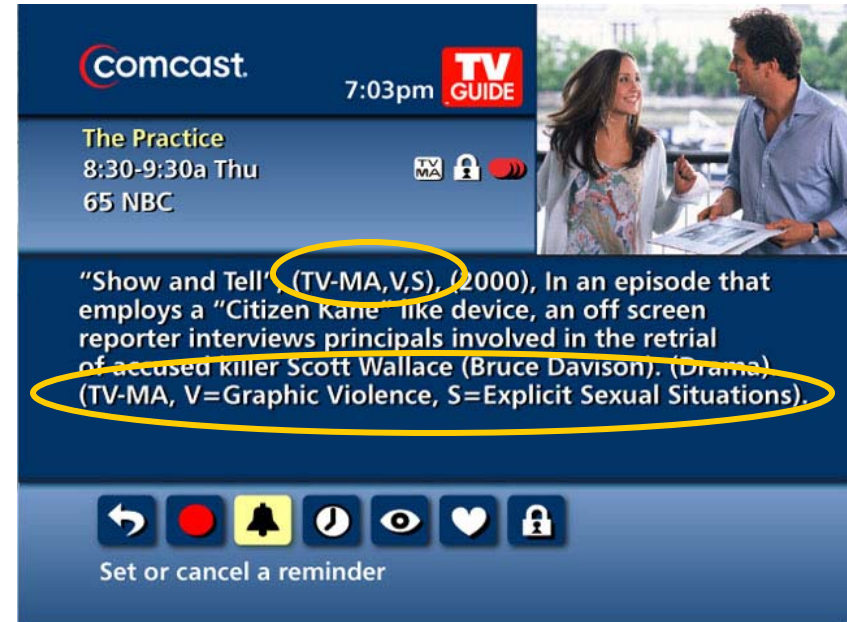


Content Locks

1. Lock a specific level of TV Violence
2. “Rating Ceiling”

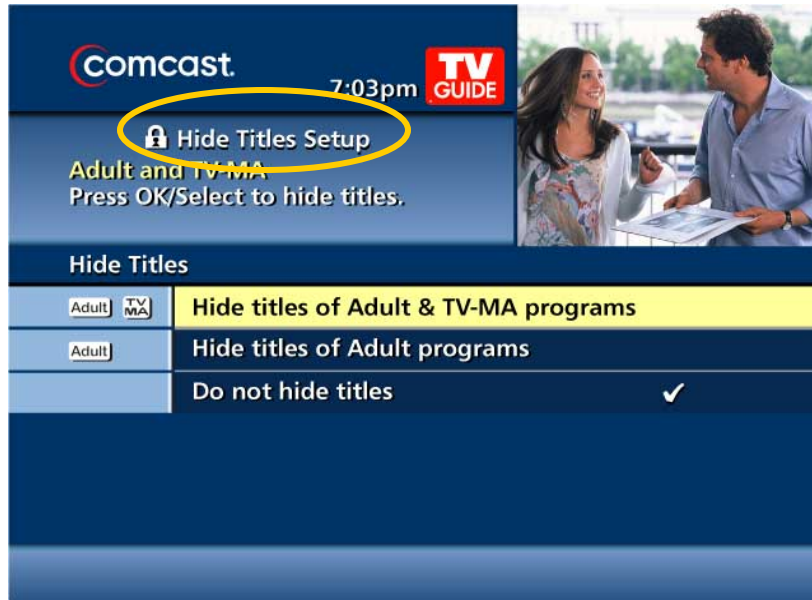
Example: Customer has selected to lock Moderate Violence and the guide automatically locked Intense and Graphic Violence

Content Labels are displayed in the TV Listings grid



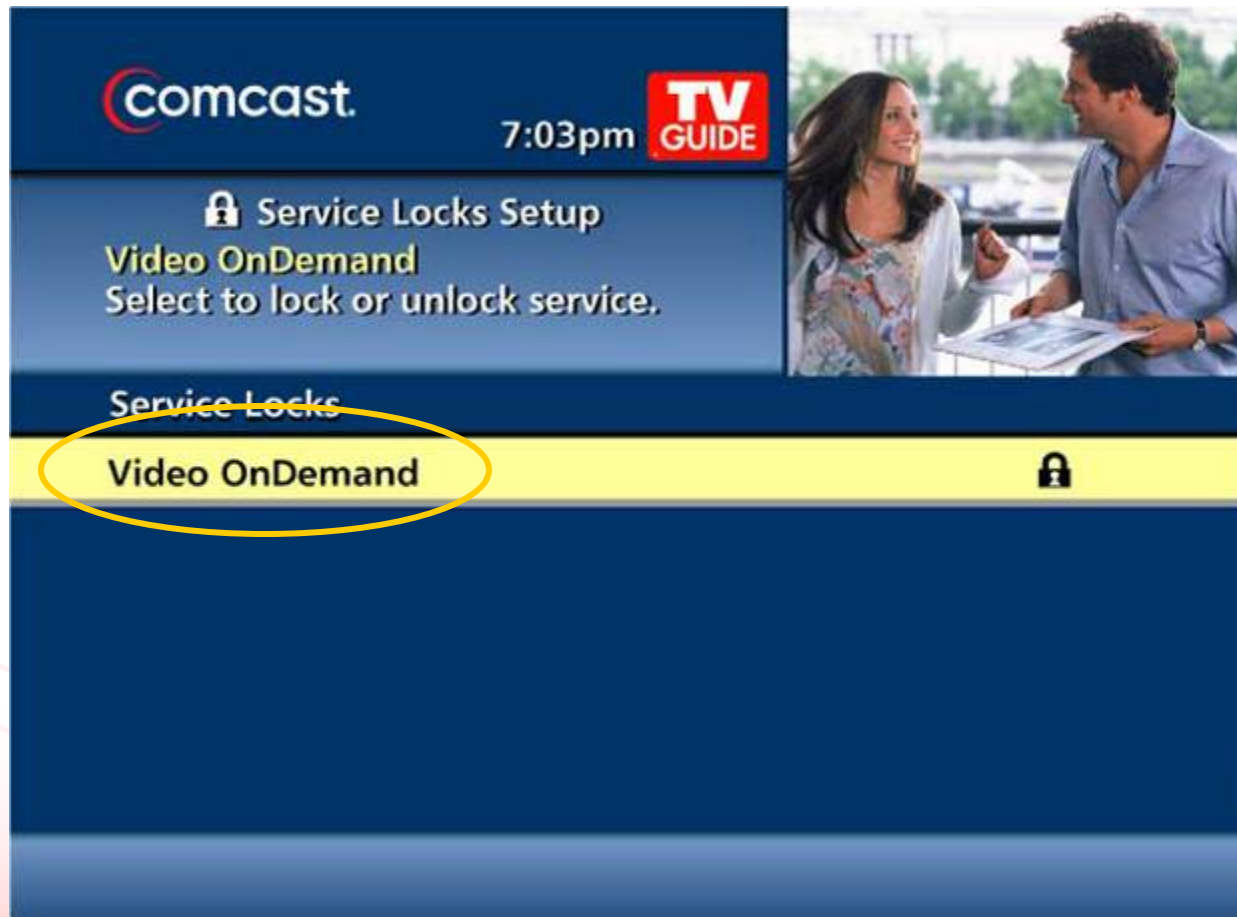
Enhanced ability to view program rating information and content descriptions

- Instant info area
 - TV Rating
 - Content Labels (V, S, D, L)
- Full Info
 - TV Rating
 - Content Label
 - Description of Label



Hide Titles – Three Settings

1. Hide Adult & TV-MA – actual titles are replaced with “Adult Programming” or “TV-MA programming”
2. Hide Adult Titles Only
3. Do not hide titles

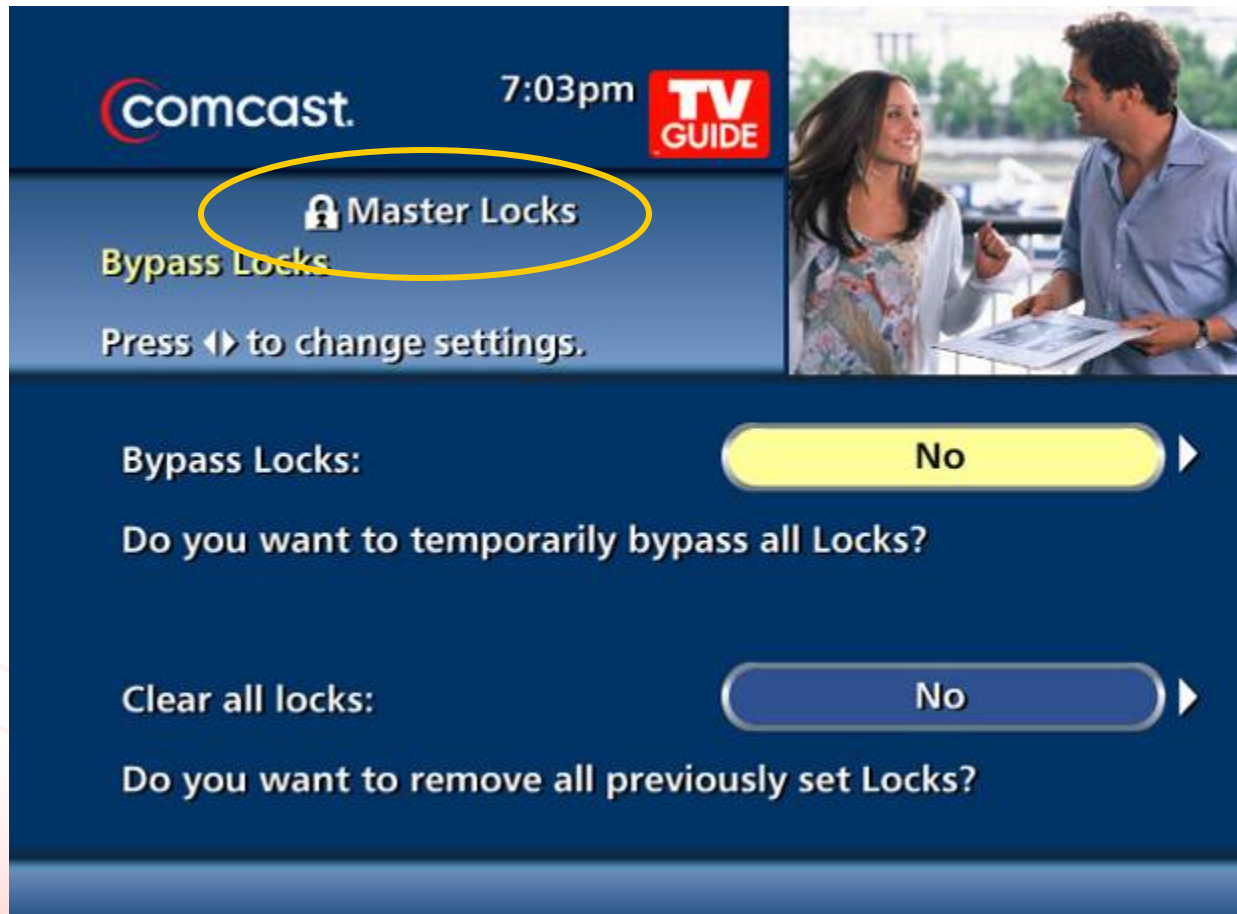


Service Locks

1. Allows customers to lock access to On Demand as a feature

Example: Customer has selected to lock On Demand. Anytime the On Demand button on the remote is pressed, the user will be prompted to enter a PIN before being allowed to access On Demand.

Please Note: On Demand programs may also be blocked using TV and Movie Ratings settings.



Master Locks

1. **Bypass Locks** – users can temporarily turn off all locks. Turning off the STB will restore the locks.
2. **Clear All** – allows customers to clear all previously set locks

Comcast Continues To Explore New Ways To Empower Parents

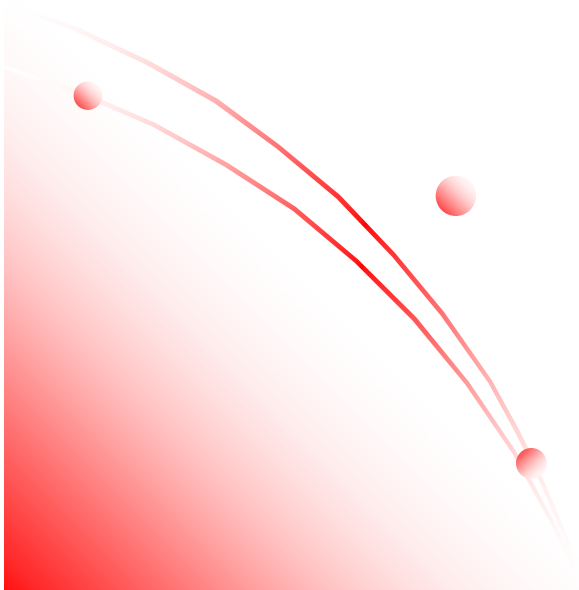


1. Comcast is experimenting with a “Parental Control Dashboard” that would enable parents to see all currently set locks via a summary screen.
2. Comcast is also exploring implementation of an “EZ Setup Wizard” that would provide step-by-step guidance to engage parental controls.

ATTACHMENT 2



Online Safety Overview

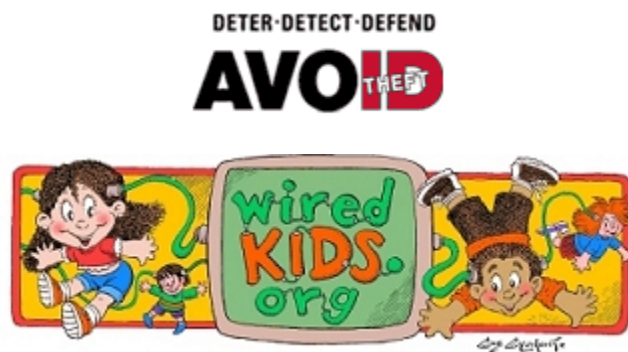


Comcast is committed to providing the tools and safeguards to help keep all of our users safe online, particularly our youngest ones. We participate in three key areas of online children's safety, including:

- ✓ **Parental Controls** - Internet controls that enable parents to monitor and filter their family's online activity.
- ✓ **Customer Awareness and Education** –In-depth information to increase awareness and prevention of the latest online threats.
- ✓ **Law Enforcement Partnership** - Comcast partners with key industry and law enforcement leaders to develop and maintain the highest standards in online children's safety.

Comcast Customer Awareness & Education

Security Resources: Comcast partners with key Industry leaders to offer the latest information in online safety through Comcast.net.



Did You Know?

- ✓ Comcast Security Professionals participate in many Industry-led community forums related to online safety throughout the country!

**Comcast airs PSAs on Online Safety
sponsored by NCMEC and the AdCouncil.**



Comcast partners with federal and local law enforcement agencies (LEA) to provide quality service where it matters the most:

- ✓ The Comcast Legal Response Center is a fully staffed group of dedicated professionals who research and respond to High Speed Internet legal requests (court orders, subpoenas, etc.).
- ✓ Comcast maintains a good working relationship with LEAs at the national and local level.

Did You Know?

- ✓ In November, 2006 80% of the after hours emergency law enforcement support was related to a missing or exploited child incidents.



Active Member, HTCIA

Child Protection: Comcast prioritizes the investigation and handling of child exploitation incidents.

- ✓ Comcast has established a special alerting process with law enforcement to quickly aid in the investigation of crimes against children (e.g., child pornography, missing child, etc.)

Did You Know?

- ✓ Comcast reports incidents of child exploitation images to the National Center for Missing and Exploited Children's CyberTipLine.

